

1	STEVE KLEIN, Individually and on)	No. 2:18-cv-03520-GW-MRW
2	Behalf of All Others Similarly)	
3	Situated,)	<u>CLASS ACTION</u>
4)	
5	Plaintiff,)	JUDGE: Hon. George H. Wu
6)	
7	vs.)	
8)	
9	COLONY NORTHSTAR, INC.,)	
10	RICHARD B. SALTZMAN, DARREN)	
11	J. TANGEN, NEALE REDINGTON,)	
12	and DAVID T. HAMAMOTO,)	
13)	
14	Defendants.)	

PLEASE TAKE NOTICE that on Thursday, July 5, 2018 at 8:30 a.m. before the Honorable George H. Wu in Courtroom 9D – 9th Floor, First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012, Movants Jack Cox, Georgios Papadopoulos, and Kenneth Haley (collectively, “Movants” or the “Colony NorthStar Investor Group”), will and do move this Court for an order granting their Motion: (1) consolidating the related actions, (2) for appointment of Movants as Lead Plaintiffs of the Class; and (3) for approval of Movants’ selection of The Rosen Law Firm, P.A. and Pomerantz LLP as Co-Lead Counsel for Plaintiffs and the Class.

This Motion is brought pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B) and Federal Rule of Civil Procedure 42(a), on the grounds (1) that the related actions should be consolidated as they involve common questions of law and fact and consolidation would promote judicial economy; (2) that Movants should be appointed as Lead Plaintiffs for the class of all purchasers or acquirers of Colony NorthStar, Inc. securities during the period between February 28, 2017 and March

1 1, 2018, inclusive (the “Class Period”), as Movants have timely made this
 2 Motion, have the largest financial interest and otherwise satisfy the pertinent
 3 requirements of Federal Rule of Civil Procedure 23; and (3) that Movants’
 4 selection of The Rosen Law Firm, P.A. and Pomerantz LLP as Co-Lead Counsel
 5 should be approved as the firms are well-qualified and have extensive experience
 6 in cases of this type.

7 In support of this Motion, Movants file herewith a Memorandum of Points
 8 and Authorities, the Declaration of Laurence Rosen, a Certification and Notice of
 9 Interested Parties, and a Proposed Order.

10 Local Rule 7-3 requires a conference of counsel prior to filing motions.
 11 Due to the PSLRA’s lead plaintiff procedure, however, Movants do not yet know
 12 which other entities or persons plan to move for appointment as lead plaintiff
 13 until after all the movants have filed their respective motions. Under these
 14 circumstances, Movants respectfully request that the conferral requirement of
 15 Local Rule 7-3 be waived.

16
 17 Dated: June 5, 2018

Respectfully submitted,

18 **THE ROSEN LAW FIRM, P.A.**

19
 20 /s/ Laurence Rosen, Esq.

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18 *Counsel for Movants and [Proposed] Co-*
19 *Lead Counsel for the Class*
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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:
I am the managing attorney of The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On June 5, 2018, I electronically filed the following **MOTION OF THE COLONY NORTHSTAR INVESTOR GROUP TO CONSOLIDATE RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL OF CHOICE OF COUNSEL** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on June 5, 2018.

/s/ Laurence Rosen
Laurence M. Rosen